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April 26, 2013

VIA FEDERAL EXPRESS

Honorable Shira A. Scheindlin
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 1620
New York, New York 1007-1312

Re: *In Re MTBE Products Liability Litigation*, MDL 1358
This Document Relates to: *Orange County Water District v. Unocal Corp., et al.*
Plaintiff Orange County Water District's Objections to Pre-Trial Order #76

Dear Judge Scheindlin:

In support of and in connection with Plaintiff Orange County Water District's Objection to Pre-Trial Order #76 being filed today, enclosed please find a copy of the briefings and hearing transcript relating to proceedings before Special Master Warner on this issue.

1. January 20, 2012, Defendants' Motion To Compel Production of Document Improperly Withheld During Deposition of Dr. Wheatcraft
2. January 30, 2012, Plaintiff Orange County Water District's Submission Regarding Conoco's Motion to Compel Document Concerning Dr. Wheatcraft's Deposition
3. February 7, 2012, Letter from T. O'Reilly to J. Anderson regarding the Deposition of Dr. Wheatcraft & Pre-Trial Order #71
4. February 20, 2012, Reporter's Transcript of Hearing Before Special Master Warner
5. March 15, 2012, Plaintiff Orange County Water District's Objection to Pre-Trial Order #71
6. March 22, 2012, Defendants' Response to Plaintiff Orange County Water District's Objection to Pre-Trial Order #71

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7. March 26, 2012, Plaintiff Orange County Water District's Reply in Support of its Objection to Pre-Trial Order #71
8. July 9, 2012, Supplemental Briefing re: Motion to Compel Production of Document Improperly Withheld During Deposition of Dr. Wheatcraft
9. July 30 2012, Plaintiff Orange County Water District's Opposition to Defendant ConocoPhillips Company's Supplemental Motion to Compel Privileged Document Concerning Dr. Wheatcraft's Deposition
10. August 13, 2012, Defendants' Reply in Support of Supplemental Briefing re: Motion to Compel Production of Document Improperly Withheld During Deposition of Dr. Wheatcraft
11. March 22, 2013, Defendants' Pending Motion to Compel Production of Document Improperly Withheld During Deposition of Dr. Wheatcraft

Please let us know if you have any questions regarding the enclosed.

Respectfully submitted,



Tracey L. O'Reilly

TOR/tlz

Encls.

cc: All Counsel (via LNF&S w/out attachments)